

In the Matter of)
)
Section 68.4 of the Commission's Rules) WT Docket No. 01-309
Governing Hearing Aid-Compatible)
Telephones)

Cingular Wireless LLC Petition for Waiver of)
Section 20.19(c)(3)(i) of the Commission's)
Rules)

To: The Commission

Research In Motion Limited (“RIM”) submits these comments in response to the Petition for Waiver of Section 20.19(c)(3)(i)(A) of the Commission’s Rules governing hearing aid compatible (“HAC”) telephones filed by Cingular Wireless LLC (“Cingular”).

RIM agrees with Cingular that there are significant technological challenges inherent in achieving a U3 rating for handsets operating in the 850 MHz band under the current standard. RIM has been and will continue to be actively involved in seeking solutions to this issue directly as manufacturer, jointly with Cingular, and as part of the Alliance for Telecommunications Industry Solutions (“ATIS”) Incubator Solutions 4 Working Group 9, which was established to evaluate hearing aid compatibility technical issues affecting wireless devices operating in 850 MHz and higher power technologies.

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